

November 17, 2004

Randy Segawa  
Dept. of Pesticide Regulation  
1001 I St.  
PO Box 4015  
Sacramento, CA 95812-4015

**Re: Environmental Justice Pilot Project**

Dear Mr. Segawa:

Sierra Club California supports the development of environmental justice pilot projects at Cal-EPA, and appreciates the opportunity to comment on DPR's proposal for pesticide air monitoring in a rural community. We agree that such monitoring is needed, and we offer the following two comments to make the monitoring study as useful as possible.

1. The proposal is missing a major component -- monitoring for off-site exposures to the specific pesticides that are being applied **when they are being applied** is essential. That would suggest a study design that includes timed pesticide monitoring with pesticide applications in the vicinity of the monitoring location. (This is called "synoptic" monitoring.)

Some monitoring of supposed "non-application" ordinary times is also important, due to lack of information about actual applications--real exposures are a mix of "during application" exposures and "background" of all the elements in the air all the time.

2. The proposal would only study air exposures, even though a major route of pesticide exposures for children is through the dirt and dust that they are exposed to. Looking only at the "air pathway" underestimates exposures, perhaps significantly. The most affected community members are exposed both at work and at home, and bring pesticides from work home to their families on their clothes (not to mention the pollutants that are tracked in or blown in on dust from outdoors). Some of those exposed people are drinking contaminated groundwater, also. Thus a real environmental justice study would consider all exposure pathways, not just air.

Thank you for considering our views.

Sincerely,

Bill Magavern  
Senior Legislative Representative